



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-3

May 29, 1997

George R.A. Doumar, Treasurer
Fairfax County Republican Committee
(Federal)
4321 Markham Street
Annandale, VA 22003

Identification Number: C00277335

Reference: October Quarterly (7/1/96-9/30/96), 12 Day Pre-General (10/1/96-10/15/96) and 30 Day Post-General (10/16/96-11/25/96) Reports

Dear Mr. Doumar:

This letter is to inform you that as of May 28, 1997, the Commission has not received your response to our requests for additional information dated May 7, 1997. These notices request information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to these requests (copies enclosed).

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions regarding this matter, please contact Melissa Hurd on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosures



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

George R.A. Doumar, Treasurer
Fairfax County Republican Committee
(Federal)
4321 Markham Street
Annandale, VA 22003

MAY 7 1997

Identification Number: C00277335

Reference: October Quarterly Report (7/1/96-9/30/96)

Dear Mr. Doumar:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organization(s) which is not a political committee registered with the Commission. In order for your committee to accept contributions from unregistered organizations into accounts used to influence federal elections, your committee should take steps to insure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 2 U.S.C. §§441a(f) and 441b or 11 CFR §102.5(b). Under 11 CFR §102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible. To the extent that your committee has received impermissible funds, the Commission recommends that you transfer the impermissible funds to an account not used to influence federal elections or refund the impermissible amount(s) to the

donor(s) in accordance with 11 CFR §103.3(b). In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of receiving a refund or granting written authorization for a transfer to another account.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. Should you choose to transfer-out or refund the contribution(s), the Commission will presume the funds were impermissible if no statement from your committee provides information to the contrary. Transfers-out and refunds should be disclosed on a Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts will be taken into consideration.

-Your report discloses limited payments for administrative expenses. Each committee utilizing separate federal and non-federal accounts is required to allocate any administrative expenses between the accounts in proportion to the BALLOT COMPOSITION METHOD derived from FEC Schedule H1. A Schedule H1 must be filed with the first FEC FORM 3X submitted each year. 11 CFR §106.5(d)

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. Please provide the necessary information regarding administrative expenses incurred by your committee and/or amend your report to disclose such expenses according to the referenced provisions of the Act and Commission Regulations.

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have failed to include the purpose for several joint expenditures to various vendors. Note that the unique identifying code for an event is not considered an adequate description of purpose. Please amend your report to include this missing information.

-Your report disclosed certain categories of financial activity that have been reflected on the wrong lines of the Detailed Summary Page. Operating Expenditures such as schoolroom rental, food, phones, etc. should be properly disclosed on a separate Schedule B, supporting Line 21(b) of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Melissa Hurd
Reports Analyst
Reports Analysis Division

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s)
for each category of the
Detailed Summary PagePAGE 1 OF 1
FOR LINE NUMBER
11-C₃

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

Fairfax County Republican Committee

A. Full Name, Mailing Address and ZIP Code

Virginia Beer Wholesalers Assn
PAC, P.O. Box 508
Richmond, VA 23204

Name of Employer

N/A

Date (month,
day, year)

8/29/96

Amount of Each
Receipt this Period

\$1,000

Receipt For:

☐ Primary ☐ General
☐ Other (specify):

Occupation

Aggregate Year-to-Date > \$ 1,000

B. Full Name, Mailing Address and ZIP Code

Gail Davis for Attorney General
P.O. Box 3800
Mer 22116

Name of Employer

N/A

Date (month,
day, year)

8/30/96

Amount of Each
Receipt this Period

\$1,000

Receipt For:

☐ Primary ☐ General
☐ Other (specify):

Occupation

Aggregate Year-to-Date > \$ 1,000

C. Full Name, Mailing Address and ZIP Code

Great Falls Republican
Women's Club

Name of Employer

N/A

Date (month,
day, year)

9/5/96

Amount of Each
Receipt this Period

\$250

Receipt For:

☐ Primary ☐ General
☐ Other (specify):

Occupation

Aggregate Year-to-Date > \$ 250

D. Full Name, Mailing Address and ZIP Code

Lincoln Club

Name of Employer

N/A

Date (month,
day, year)

8/29/96

Amount of Each
Receipt this Period

\$1,000

Receipt For:

☐ Primary ☐ General
☐ Other (specify):

Occupation

Aggregate Year-to-Date > \$ 1,000

E. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt this Period

Receipt For:

☐ Primary ☐ General
☐ Other (specify):

Occupation

Aggregate Year-to-Date > \$

F. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt this Period

Receipt For:

☐ Primary ☐ General
☐ Other (specify):

Occupation

Aggregate Year-to-Date > \$

G. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt this Period

Receipt For:

☐ Primary ☐ General
☐ Other (specify):

Occupation

Aggregate Year-to-Date > \$

SUBTOTAL of Receipts This Page (optional)

\$3,250

TOTAL This Period (last page this line number only)

\$3,250